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Plaintiff in Pro Per

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**Arjun Vasan,**  
Plaintiff and Counter-Defendant

vs.

**Checkmate.com, Inc.,**  
(dba "Checkmate"),  
Defendant and Counterclaimant

Case No.: 2:25-cv-00765-MEMF-JPR  
Hon. Maame Ewusi-Mensah Frimpong

**NOTICE OF NON-OBJECTION TO  
LIMITED SUR-REPLY TO PLAINTIFF'S  
REPLY IN SUPPORT OF HIS MOTION  
TO DISMISS DEFENDANT'S  
COUNTERCLAIMS;**

Complaint Filed: January 28, 2025  
Hearing Date: \_\_\_\_\_  
Hearing Time: \_\_\_\_\_  
Courtroom: 8b

TO THE HONORABLE COURT:

Plaintiff Arjun Vasan ("AV") files this Notice of Non-Objection to a limited sur-reply, while maintaining that the arguments in his Reply (Dkt. 98) were proper rebuttal material, and that any evidence filed therewith (or in the initial Dkt. 97 filing) has been filed previously in this case or the related SDNY action—and was in fact created by Checkmate.

1 Checkmate's evidentiary objections are disingenuous—it cannot withhold documents on  
2 which its pleadings necessarily rely and later object when its AV attaches them—and points out  
3 its failure to do the same. Moreover, Exhibit D was filed in SDNY on September 1<sup>st</sup>, 18 days  
4 before Checkmate's untimely opposition. The notices were earlier filed here and described in  
5 AV's complaint (Dkt. 10 ¶¶ 50-52, 121-123 (extortionate attempts to coerce "admissions")).  
6 They are no surprise. The CCs rely on these pre-suit notices and responses for a substantial share  
7 of allegations. The Court may weigh if threats to "litigate" "criminal liability" and enjoin lawful  
8 work—while withholding earned wages and demanding "immediate reimbursement"—strayed  
9 beyond zealous advocacy; and if "admissions" under such conditions should be considered.

10 AV's motion expressly preserved unconscionability, citing statutes and governing law  
11 (Dkt. 81 at 15:9-11, 28:5-7) and each point later made in the new section—which organizes the  
12 material in rebuttal to arguments that (1) the motion was disorganized; (2) that AV had not  
13 sufficiently supported claims of adhesion (Dkt. 94 at 25:13-21); and (3) that such arguments  
14 require the Court to weigh extrinsic evidence (*Id.*). AV's Reply addresses all three points.

15 Finally, the errata notice was filed one business day after the initial Reply—Checkmate's  
16 entire Opposition was unauthorized and filed 20 days late. Checkmate suffers no prejudice from  
17 AV's correction—while AV's schedule was up in the air for those 20 days.<sup>1</sup>

18 Nonetheless, to avoid motion practice, AV will not oppose a sur-reply limited to 900  
19 words and the topics raised; lodged within 5 days—any additional delay would be prejudicial.  
20 AV requests Checkmate file the remaining source documents for any purported "admissions"—  
21 and if it doesn't, AV asks the Court to disregard the paragraphs containing them under FRE 106.

22 **Respectfully Submitted,**

23 **Dated:** October 3, 2025

/s/ *Arjun Vasan*

24 **In Cerritos, California**

25 \_\_\_\_\_  
26 *By:* **Arjun Vasan**, Plaintiff In Pro Per

27 \_\_\_\_\_  
28 <sup>1</sup> AV maintains his objection to Checkmate's untimely oppositions under L.R. 7-9, 7-12 and 7-13 and the Court's Standing Order. See Dkt. 89-91.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 11-6**

Plaintiff Arjun Vasan certifies that this brief contains 379 words, which complies with the 7000-word limit of L.R. 11- 6.1 and the Court's Civil Standing Order dated Aug. 27, 2025.

Dated: **September 25, 2025**

In: **Cerritos, California**

**Respectfully submitted,**

/s/ *Arjun Vasan*

**Arjun Vasan**, Plaintiff *In Pro Per*